

**NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

LOIDY TANG, individually	)	
and on behalf of a class,	)	11 C 2109
	)	
Plaintiff,	)	Chief Judge Holderman
	)	
v.	)	Magistrate Schenkier
	)	
MEDICAL RECOVERY SPECIALISTS,	)	
LLC, d/b/a MRS, d/b/a MRSI and d/b/a	)	
MEDICAL RECOVERY SPECIALISTS, INC.,)	)	
	)	
Defendant.	)	

**REPORT OF THE PARTIES' PLANNING MEETING**

1. The following persons participated in a Rule 26(f) conference on May 9, 2011, via telephone.

Curtis C. Warner representing the plaintiff  
James C. Vlahakis representing the defendant

2. Initial Disclosures. The parties **will complete by 30 days after the Court decides defendant's pending motion to dismiss**, the initial disclosures required by Rule 26(a)(1)

3. Discovery Plan. The parties propose this discovery plan:

(a) Discovery will be needed on these subjects:

**Plaintiff's Position:**

- i. Defendant's method of dialing telephone calls that use a prerecorded message;
- ii. The identity of those persons who received a call from Defendant using a predictive dialer with a pre-recorded message;
- iii. Whether Defendant had any express prior consent to call those persons using a predictive dialer with a pre-recorded message during the proposed class time period;
- iv. Defendant's use, policy, practices and procedures of identifying itself as "MRS" in a prerecorded message; and
- v. Any defenses defendant may raise.

**Defendant's Position:**

- i. The manner in which the phone number at issue was provided to the creditor;
- ii. What, if any, relationship there is between the debtor and/or his or her guarantor and Plaintiff; and

iii. Whether the debtor and/or his or her guarantor consented to being called at the telephone number.

(b) The date for commencing discovery is proposed to be **after the Court rules on defendant's motion to dismiss, and shall be completed 6 months thereafter;**

(c) The parties agree to follow the standard number of interrogatories and depositions.

(d) The parties do not anticipate expert testimony in this matter.

4. Amendments to Pleadings: 90 days after discovery has began.

5. Pre-Trial Conference and Trial Dates: To be set by the Court.

Respectfully submitted,

s/ Curtis C. Warner  
Curtis C. Warner

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